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7  
8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA

10  
11 VIOLA HUBBS, BRANDON  
12 COLEMAN, TAMIKA WILLIAMS,  
13 individually, and on behalf of other  
members of the general public  
similarly situated,

14 Plaintiffs,

15 vs.

16 BIG LOTS STORES, INC., an Ohio  
17 corporation; PNS STORES, INC., an  
Ohio corporation; and DOES 1  
through 10, inclusive,

18 Defendants.

Case No.: 2:15-cv-01601 JAK (ASx)

CLASS ACTION & ENFORCEMENT  
ACTION UNDER THE PRIVATE  
ATTORNEYS GENERAL ACT,  
CALIFORNIA LABOR CODE §§ 2698  
*ET SEQ.*

**SECOND JOINT STIPULATION  
REGARDING BRIEFING  
SCHEDULE RE MOTION FOR  
PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

[Concurrently filed with [Proposed]  
Order Granting Second Joint Stipulation  
Re Briefing Schedule]

Pretrial conference: None

Trial date: None

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22 Attorneys for Defendants Big Lots Stores, Inc. and PNS Stores, Inc.  
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1 Subject to Court approval, Defendants Big Lots Stores, Inc. and PNS Stores,  
2 Inc. (“Big Lots” or “Defendants”) and Plaintiffs Viola Hubbs, Brandon Coleman,  
3 and Tamika Williams (“Plaintiffs”) (together with Big Lots, the “Parties”), stipulate  
4 as follows:

5 1. On October 28, 2019 (ECF No. 338), the Court signed the Parties’ first  
6 joint stipulation to extend the deadline to file the Motion for Preliminary Approval.  
7 The Court approved the following briefing schedule on the Motion for Preliminary  
8 Approval of Class Action Settlement:

- 9 a. Motion to be filed no later than November 25, 2019;  
10 b. Opposition, if any, to be filed by December 9, 2019;  
11 c. Reply, if any, to be filed by December 16, 2019.

12 2. In the Court’s October 28, 2019, Order, it stated that “[a]bsent a  
13 showing of compelling reasons that could not reasonably have been anticipated,  
14 there will be no further extensions of these deadlines.” Although the Parties have  
15 agreed to substantially all material terms, a single unanticipated issue relating to  
16 non-monetary relief arose this week. The Parties have resolved this issue and are  
17 finalizing the language. Because of this, Plaintiffs’ Counsel need additional time to  
18 obtain signatures from all four Plaintiffs – one of whom is currently homeless – on  
19 both the long form agreement and supporting declarations that must be filed with the  
20 Motion for Preliminary Approval.

21 3. The Parties therefore agree to continue the briefing schedule for  
22 Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement by 10 days.

23 4. The Parties have conferred and agree that a hearing on the Motion is  
24 not necessary and waive oral argument.

25 5. The Parties hereby request that the Court issue an order setting the  
26 preliminary approval schedule as follows:

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Event	Deadline/Date
Last Day to file Motion for Preliminary Approval of Class Action Settlement	December 5, 2019
Last Day to file any responses to the Motion	December 19, 2019
Last day to file any replies to the Motion	December 27, 2019

Dated: November 21, 2019

Respectfully submitted,

Law Offices of Mark Yablonovich

/s/Mark Yablonovich

Mark Yablonovich  
Attorney for Plaintiffs Viola Hubbs, Brandon Coleman, Tamika Williams, and the Class

Dated: November 21, 2019

Respectfully submitted,

Vorys, Sater, Seymour and Pease, LLP

/s/Mark Knueve

Mark Knueve  
Attorney for Defendants  
Big Lots Stores, Inc. and PNS Stores, Inc.

**Statement Pursuant to L.R. 5-4.3.4(a)(2)(i)**

All other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: November 21, 2019

/s/Mark Yablonovich

Mark Yablonovich  
Law Offices of Mark Yablonovich

Attorney for Plaintiffs Viola Hubbs, Brandon Coleman, Tamika Williams, and the Class